

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE**

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|------------------------------------|---|---------------------------------|
| IN RE: |) | |
| LISA NICOLE HANEY |) | CASE NO: 18-01992-RSM-13 |
| 1411 LEBANON PIKE APT 0-160 |) | CHAPTER 13 |
| NASHVILLE, TN 37210 |) | JUDGE MASHBURN |
| SSN/ITIN: XXX-XX-4426 |) | |
| Debtor. |) | |

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: May 23, 2018
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: June 4th, 2018, AT 8:30 A.M.
IN COURTROOM 1, 2nd FLOOR, CUSTOMS HOUSE, 701 BROADWAY, NASHVILLE, TN 37203

**DEBTORS' RESPONSE TO THE TRUSTEE'S NOTICE AND MOTION TO DISMISS
CASE FOR FAILURE TO PAY**

COMES NOW the Debtors, by and through counsel, and would respond to the Trustee's Notice and Motion to Dismiss Case for Failure to Pay

1. Debtor is now making timely payments in full and will catch up the plan by hearing date. Debtor will continue making payments moving forward.
2. Based on the preceding facts, the Debtor respectfully request that the Trustee's Motion be denied

Respectfully submitted this the 11th day of May, 2018

/s/ Joseph Wharton
JOSEPH WHARTON, #034508
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Attorneys for Debtor(s)
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 11th day of May, 2018, true and correct copies of the foregoing have been served in the following manner:

Email by Electronic Case Noticing to:

Beth R. Derrick, Assistant U.S. Trustee
Henry E. Hildebrand, III, Chapter 13 Trustee

By U.S. Postal Service, postage prepaid to:

Debtor(s) at the above referenced address

By Certified Mail to:

Total Mailings by U.S. Postal Service: 1

/s/ Joseph Wharton
JOSEPH WHARTON #034508